

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Archdiocese of Milwaukee,

Adv. Proc. No. 12-02835-svk

Plaintiff,

and

**Donald Marshall,
Dean Weissmuller,**

Additional Plaintiffs,

vs.

Stonewall Insurance Company, et al.,

Defendants.

**STIPULATION REGARDING FEE CAP FOR THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS PROFESSIONALS IN COVERAGE LITIGATION
AGAINST VARIOUS UNDERWRITERS AT LLOYD'S, LONDON AND STONEWALL
INSURANCE COMPANY**

The Official Committee of Unsecured Creditors (the "Committee") and the Archdiocese of Milwaukee ("Archdiocese" or "Debtor") hereby stipulate and agree to the following:

WHEREAS, on February 24, 2011, this Court issued an *Order Granting Application for Entry of an Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones*,

James I. Stang
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LLP as Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to January 25, 2011 [Bankr. Case No. 11-20059-svk, Dkt. No. 153] allowing the retention of the law firm of Pachulski Stang Ziehl & Jones (“PSZJ”);

WHEREAS, on December 20, 2011, this Court issued the *Order Approving the Application of the Official Committee of Unsecured Creditors Pursuant to Fed. R. Bankr. P. 2014 for an Entry of an Order Authorizing and Approving the Employment of the Law Offices of Paul A. Richler as Special Insurance Counsel to the Official Committee of Unsecured Creditors*, [Bankr. Case No. 11-20059-svk, Dkt. No. 513] authorizing the Committee to employ and retain Paul A. Richler (“Richler”);

WHEREAS, on November 13, 2012, the Debtor filed the *Complaint for Declaratory Relief* [Adv. Proc. No. 12-02835-svk, Dkt. No. 1] against Stonewall Insurance Company and various Underwriters at Lloyd’s, London (the “Insurance Coverage Action”);

WHEREAS, in order to reduce expenses to the estate, Committee and the Debtor agreed to cooperate with respect to prosecution of rights against insurers in the Insurance Coverage Action;

WHEREAS, to promote efficiency and avoid future fee disputes, the parties agreed to establish a fee cap for the Committee’s professionals’ assistance in the Insurance Coverage Action;

THEREFORE, the Committee and the Debtor stipulate as follows:

1. All legal work performed by professionals retained by the Committee, including but not limited to PSZJ and Richler, in connection with the Debtor’s pursuit of the Insurance Coverage Action, will be subject to a fee cap of \$200,000.

2. The fee cap on professional services will be exclusive of any costs or disbursements.
3. The fee cap on professional services will begin with services rendered on or after October 5, 2012.
4. If this proceeding leads to further mediation sessions related to the Insurance Coverage Action, the first thirty (30) hours of any mediation participation will be included within this fee cap.
5. The Committee and its professionals reserve the right to request additional fees for attendance at mediation sessions that go beyond the thirty (30) hour inclusion of mediation fees, and the Debtor reserves the right to object to any such requests.

[Signature Pages Follow]

Respectfully submitted,

April

Dated: March 18, 2013

THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS,
by its counsel,

Pachulski Stang Ziehl & Jones LLP,

By:

[Signature]
James T. Stang
Kenneth H. Brown
Gillian N. Brow

-and-

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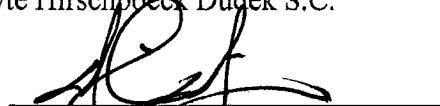
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April 19,
Dated: March 19, 2013

ARCHDIOCESE OF MILWAUKEE
Debtor and Debtor in Possession
by its counsel,
Whyte Hirschboeck Dudek S.C.

By: 

Daryl L. Diesing
Bruce G. Arnold
Francis H. LoCoco
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